

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SHERRY LEWIS and DAVID V. LEWIS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

GOVERNMENT EMPLOYEES
INSURANCE COMPANY,

Defendant.

C.A. No. 1:18-CV-05111-RBK-KMW

**STIPULATION AND ORDER TO
EXTEND CASE SCHEDULE**

Plaintiffs David Lewis and Sherry Lewis in the above captioned action and Defendant Government Employees Insurance Company, collectively the “Parties” hereby submit the following proposed case schedule. The Parties are proceeding with diligence but are experiencing an enormous, unexpected strain on their resources as a result of the COVID-19 pandemic. Additional time is needed for the Parties to navigate these complications and complete discovery. Accordingly, the Parties stipulate and agree that the schedule be extended by six months as follows:

Expert Discovery Related to Class Certification.	CURRENT DEADLINE	DEADLINE
Telephonic Status Conference	April 17, 2020 at 10:00 a.m.	October 16, 2020 at 10:00 a.m.
All expert reports and expert disclosures relating to class certification due	June 12, 2020	Dec. 11, 2020
Depositions of plaintiffs' proposed experts for class certification completed by	July 24, 2020	Jan. 26, 2021
Expert reports and expert disclosures relating to class certification on behalf of defendant completed by	August 14, 2020	Feb. 16, 2021
Depositions of defendant's proposed experts for class certification completed by	September 18, 2020	March 16, 2021
Pretrial factual discovery closes on	November 25, 2020	May 28, 2021
Class Certification Motions.		
Plaintiffs shall file their motion for class certification no later than	June 12, 2020	Dec. 11, 2020
Any response to the motion shall be filed no later than	August 14, 2020	Feb 16, 2021
Any reply shall be filed on or before	October 16, 2020	April 16, 2021
The Court will conduct a telephone status conference on	October 26, 2020 at 10:00 a.m.	April 26, 2021 at 10:00 a.m.

Respectfully submitted this April 13, 2020.

<p>Respectfully submitted,</p> <p>By <u>/s/ James E. Cecchi</u> James E. Cecchi CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C. 5 Becker Farm Rd. Roseland, NJ 07068-1739 Telephone: (973) 994-1700 Facsimile: (973) 994-1744 cbartlett@carellabyrne.com</p> <p>Steve W. Berman (WSBA #12536) HAGENS BERMAN SOBOL SHAPIRO LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101 Telephone: (206) 623-7292 Facsimile: (206) 623-0594 steve@hbsslaw.com</p> <p>Robert B. Carey (<i>pro hac vice</i>) John M. DeStefano (<i>pro hac vice</i>) HAGENS BERMAN SOBOL SHAPIRO LLP 11 West Jefferson Street, Suite 1000 Phoenix, AZ 85003</p>	<p>By: <u>/s/ Francis X. Nolan</u> Francis X. Nolan Kymberly Kochis (<i>pro hac vice</i>) Alexander Fuchs (<i>pro hac vice</i>) EVERSHEDS SUTHERLAND LLP 1114 Avenue of the Americas The Grace Building, 40th Floor New York, New York 10036 Telephone: (212) 389-5000 Facsimile: (212) 389-5099</p> <p><i>Attorneys for Defendant</i></p>
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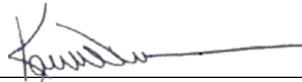
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Attorneys for Plaintiffs

So Ordered this 14th day of April, 2020.



KAREN M. WILLIAMS

United States Magistrate Judge